

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
BOSTON DIVISION**

**EDUARDO CARPANEDA, on behalf of himself and
all others similarly situated,**

Plaintiff

v.

**DOMINO'S PIZZA, INC.; DOMINO'S, INC.;
DOMINO'S PIZZA, LLC; PMLRA PIZZA, INC.;
and HENRY ASKEW,**

Defendants

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: **Case No. 1:13-cv-12313-WGY**
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OFFER OF JUDGMENT

TO: Stephen S. Churchill (steve@fairworklaw.com)
Hillary Schwab (hillary@fairworklaw.com)
Fair Work, P.C.
192 South Street, Suite 450
Boston, MA 02111

Pursuant to Fed. R. Civ. P. 68, Defendant PMLRA Pizza, Inc. hereby offers to allow judgment to enter against it in this action in the amount of Nineteen Thousand Five Hundred Dollars (\$19,500.00), plus reasonable attorneys' fees and costs relating to this action, to be decided by the Court at an assessment of damages proceeding. This offer is made to satisfy all of Plaintiff Eduardo Carpaneda's claims for relief in the instant action against all defendants. This offer of judgment is made for the purposes specified in Federal Rule 68, and is not to be construed as an admission that Defendant, PMLRA Pizza, Inc., or any other defendant, is liable in this action, or that Plaintiff has suffered damage.

Respectfully submitted,

/s/ Eric R. LeBlanc

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*Attorneys for Defendant
PMLRA Pizza, Inc.*

Dated: March 31, 2014

CERTIFICATE OF SERVICE

I, Eric R. LeBlanc, hereby certify that on March 31, 2014, I served a copy of the foregoing document by first class mail, postage prepaid and email upon the following attorneys of record:

For the Plaintiff:

Stephen S. Churchill (steve@fairworklaw.com)
Hillary Schwab (hillary@fairworklaw.com)
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For Defendant Domino's Pizza, Inc., Domino's, Inc.
and Domino's Pizza, LLC:

Daniel J. Blake (Daniel.blake@leclairryan.com)
LeClair Ryan, P.C.
One International Place, 11th Floor
Boston, MA 02110

/s/ Eric R. LeBlanc

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this 10th day of April 2014.

/s/ Eric R. LeBlanc